

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 3:21-cr-00264
)	CHIEF JUDGE CRENSHAW
BRIAN KELSEY)	
JOSHUA SMITH)	

**JOINT MOTION TO EXTEND THE DEADLINE TO FILE
DISCOVERY RELATED MOTIONS**

Come now Brian Kelsey and Joshua Smith, by and through counsel of record, and hereby respectfully move this Honorable Court to extend the deadline to file discovery related motions. The present deadline is Friday, May 6, 2022. The defendants are requesting a sixty (60) day extension of time to file discovery related motions. As grounds for this motion, Mr. Kelsey and Mr. Smith would state and show that they have received discovery in this case, but they have not been able to review all of it at this time. In fact, counsel for Mr. Kelsey received additional discovery on Monday, May 2, 2022.

Mr. Kelsey and Mr. Smith do not have any issues at this time with the timeliness of the discovery disclosures. Mr. Kelsey and Mr. Smith believe that the government is working diligently and is providing discovery in a timely manner. However, Mr. Kelsey and Mr. Smith simply need additional time to complete their review of the discovery before knowing what, if any, discovery-related motions need to be filed.

Mr. Kelsey and Mr. Smith are requesting to have an additional sixty (60) days (until July 5, 2022) to file discovery related motions.

The government does not oppose this motion.

Respectfully submitted,

s/ **Paul Bruno**

Paul Bruno, B.P.R. #17275
Bulloch, Fly, Hornsby & Evans PLLC
302 North Spring Street
P.O. Box 398
Murfreesboro, Tennessee 37133-0398
(615) 896-4154
pauljbruno@bfhelaw.com

s/ **Jerry Martin**

Jerry Martin, B.P.R. #20193
Barrett, Johnston, Martin & Garrison, LLC
414 Union Street, Suite 900
Nashville, TN 37219
(615) 244-2202
jmartin@barrettjohnston.com

s/ **David Rivera**

David Rivera, B.P.R. #24033
Barrett, Johnston, Martin & Garrison, LLC
414 Union Street, Suite 900
Nashville, TN 37219
(615) 244-2202
drivera@barrettjohnston.com

s/ **Hal D. Hardin**

Hal D. Hardin
211 Union Street
Suite 200
Nashville, TN 37201
(615) 369-3377
Email: hal@hardinlawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Joint Motion To Extend The Deadline To File Discovery Related Motion* has been electronically delivered to Amanda Klopf, Assistant United States Attorney, 110 Ninth Avenue, South, Suite A961, Nashville, TN 37203-3870; David Pritchard, Assistant United States Attorney, 167 North Main Street, Suite 800, Memphis, TN 38103; and John P. Taddei, U.S. Department of Justice, 1301 New York Ave. NW, Washington, DC 20530; this the 4th day of May, 2022.

s/ **Paul Bruno**

Paul Bruno